

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 18, 2018

Mr. Melvin Christopher, Vice President  
Pacific Gas and Electric Company  
Gas Transmission and Distribution Operations  
6121 Bollinger Canyon Road  
San Ramon, CA 94583

GI-2018-10-PGE-11

SUBJECT: General Order 112-F Gas Inspection of PG&E's North Bay Division

Dear Mr. Christopher:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) North Bay Division on October 1 – October 12, 2018. The inspection included a review of North Bay Division's records for the period of 2015 through 2017, as well as a representative field sample of the North Bay Division's facilities. SED staff also reviewed the North Bay Division's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the attached Post-Inspection Written Preliminary Findings (Summary) section of this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations and concerns noted in the Summary.

If you have any questions, please contact Shuai (James) Zhang at (415) 603-1310 or by email at [James.Zhang@cpuc.ca.gov](mailto:James.Zhang@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno". The signature is fluid and cursive, with a large, stylized "K" and "B".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

cc: Susie Richmond, PG&E Gas Regulatory Compliance  
Kelly Dolcini, SED  
Dennis Lee, SED

# Post-Inspection Written Preliminary Findings

**Dates of Inspection:** 10/01/2018 – 10/12/2018

**Operator:** PACIFIC GAS & ELECTRIC CO

**Operator ID:** 15007 (primary)

**Inspection Systems:** North Bay Division

**Assets (Unit IDs):** North Bay Division (Unit #11)

**System Type:** GD

**Inspection Name:** PG&E North Bay Division

**Lead Inspector:** James Zhang

**Operator Representative:** Daniel Rakin

## Unsatisfactory Results

### A. Records: Corrosion Control (PRR.CORROSION)

1. Question Do records document inspection of aboveground pipe for  
Text atmospheric corrosion?

References 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Assets Covered North Bay Division (North Bay)

Issue Summary Title 49 CFR part 192.481(c) states:

*(c) If atmospheric corrosion is found during an inspection, the operator must provide protection against the corrosion as required by §192.479.*

SED reviewed North Bay Division's exposed span inspections records and found that a span at 72 Foothill Rd, San Anselmo had an inspection on 1/30/18 showing light surface rust, pitting, and disbonded coating. Previous records show that PG&E performed an inspection on 1/12/15 and noted damage to coating and rust. A Corrective Work Ticket (Notification #110403231) required corrective maintenance by 5/20/15,

and a second corrective work ticket (notification #110545233) required repair by 11/3/15 with a start date of 8/10/15. Both tickets indicated that the entire service will be replaced. However, there were no records to show that corrective actions have been completed. PG&E created an active ticket to replace the service at the time of this SED inspection.

## Concerns

### A. Records: Corrosion Control (PRR.CORROSION)

1. Question Do records adequately document actions taken to correct any Text identified deficiencies in corrosion control?

References 192.491(c) (192.465(d))

Assets Covered North Bay Division (North Bay)

Issue Summary SED reviewed North Bay Division's Cathodic Protection Maintenance Records and found two cathodic protection areas (CPA) with pipe-to-soil potentials that do not meet the -850mV criterion that are approaching their required repair date.

#### Napa:

CPA 710-01 REC has two monitoring points (44165330 and 42136557) that were found to be down on 10/3/2018 and have been down since September 2017. PG&E initially discovered the low reads during a leak repair in September 2017 and was later confirmed to affect the entire CPA during the annual CP reads conducted on 10/23/2017. PG&E has not worked on restoring this CPA since 2017. PG&E created a work notification to restore the CPA by 10/31/2018.

#### San Rafael:

CPA 985-25 REC has a monitoring point 42718426 that is approaching its required repair date. PG&E found the location to be non-compliant with the -850mV criterion by PG&E on 8/11/2017. During its field inspection, SED found a pipe-to-soil of -425 mV on 10/11/2018. PG&E has created PM 43330253 to restore the CPA by 11/11/2018.

Please provide SED with an update on the corrective action(s) taken by PG&E for the CPAs identified above.

## **B. Records: Pressure Test (PRR.PT)**

2. Question Do records indicate that pressure testing is conducted in  
Text accordance with 192.511?

References 192.517(b) (192.511(a), 192.511(b), 192.511(c))

Assets Covered North Bay Division (North Bay)

Issue Summary SED reviewed North Bay Division's leak repair records and found that PG&E deactivated partial service for leak repair #112685065 without pressure test on the A-form. PG&E responded that the repair activity was incorrectly documented as PG&E only replaced the valve at the meter with no deactivation, therefore no pressure test was required per §192.511(a). PG&E will correct and add explanation for the repair on A-form. SED recommends PG&E make sure the correct information is entered for repair activity.

## **C. Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)**

3. Question Are meters and service regulators being located consistent  
Text with the requirements of 192.353?

References 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))

Assets Covered North Bay Division (North Bay)

Issue Summary During the field inspection in North Bay Division, SED visited two locations (PM 42390964 and PM 42387034) identified by PG&E where gas meter protection will be added under the Gas Meter Protection Program. This note serves as a record of the observation.

4. Question Are meters and service regulators being installed consistent  
Text with the requirements of 192.357?

References 192.351 (192.357(a), 192.357(b), 192.357(c), 192.357(d))

Assets Covered North Bay Division (North Bay)

Issue Summary SED observed following during its field inspection:

a) The customer meter at 1003 Green Oak, Novato is not sufficiently supported. The meter is located in an unlocked shed.

b) SED observed heavy vegetation around the meters at 25 Castle Rock Dr, Mill Valley and 1930 4th St, San

Rafael.

Please provide an update on any corrective action(s) taken by PG&E.

5. Question Are methods used for taking CP monitoring readings that Text allow for the application of appropriate CP monitoring criteria?

References 192.465(a) (192.463(b), 192.463(c))

Assets Covered North Bay Division (North Bay)

Issue Summary SED observed the following cathodic potential readings during its field inspection:

-742mV @ 3151 Rita CT, Napa (10%er), PG&E replaced new anode with P/S read -1314 on 10/05/18

-642mV@ 3154 Rita CT, Napa (10%er), PG&E replaced new anode with P/S read -1105 on 10/05/18

-580mV@ 2531 Whitman St, Napa

-575mV@ 2551 Whitman St, Napa

-484mV @ 2074 West Lincoln Ave, Napa

-790 mV @ 675 East K St, Benicia

-837 mV @ 654 East L St, Benicia

-683mV @ 2034 El Dorado Ct, Novato (10%er)

-633mV @ 30 Arrowhead Ln, Novato (10%er)

-663mV@ 21 Arrowhead Ln, Novato (10%er)

-845mV @ 18 Balra Dr, Novato

-515mV @ 200 Johnstone Dr., San Rafael

-486mV @ 3 Mt. Burney Ct, San Rafael

-800mV @ 4 Yosemite Rd, San Rafael

-3700mV @ 64 Mountain View, Fairfax

-839mV @ 24 Matilda Ave, Mill Valley

-426mV @ 337 Melrose, Mill Valley

Please provide SED an update on any corrective action(s) taken and include documentation of the corrective action.